



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live*

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Dear Environmental Contact,

Many significant environmental changes are occurring for the fiber reinforced plastic (FRP) industry. As you know, air pollution emission estimation techniques for layup processes have changed and styrene air emission estimates are now much higher than previously thought. Also, your equipment and materials used to make your products may soon be changing. These equipment and materials changes will assist in complying with anticipated new environmental rules, National Emission Standards for Hazardous Air Pollutants (NESHAP), currently being developed for the reinforced plastic composites production and boat manufacturing sectors by the U.S. Environmental Protection Agency under provisions of the Clean Air Act Amendments of 1990.

I want to briefly update you on the Indiana Department of Environmental Management activities that may impact your business.

As you may have heard, the Indiana General Assembly passed legislation (House Enrolled Act 1919), effective July 1, 1999. This legislation:

1. Requires the Indiana Department of Environmental Management (IDEM) to develop a non-rule policy document to address the policies and procedures we will use to evaluate compliance and process permit applications subsequent to the availability of new emission factors for the fiber reinforced plastics industry. IDEM is required to publish a final policy by November 1999. IDEM must work with the public, the Clean Manufacturing Technology Institute and the Environmental Quality Service Council in developing the non-rule policy document.
2. Requires that IDEM develop a state rule for consideration by the Air Pollution Control Board which establishes appropriate controls of air pollution from new and existing sources in the fiber reinforced plastics industry. The rule must be completed by December 2000. Enclosed is a draft first notice of comment period for the development of new rules concerning styrene emissions. IDEM will work with the Clean Manufacturing Technology Institute and the public in developing a proposed rule.

## Non-Rule Policy Document

The non-rule policy document will explain how the change in emission estimation techniques will affect permits and reporting requirements as well as compliance and enforcement issues. IDEM anticipates having a draft non-rule policy document available by early July. To ensure a fair and effective policy, we will provide members of the fiber reinforced plastics industry opportunities to help develop the document. Initially, we are looking to establish a small group of participants to assist in developing a draft policy which could then be made available to the public, the Air Pollution Control Board, the Environmental Quality Service Council, and the Clean Manufacturing Technology Institute for review and comment before it is finalized. The final non-rule policy document will be published by November 1, 1999.

If you are interested in participating in the small core group to help with developing a draft non-rule policy document, please contact Karen Teliha by June 21, 1999. Because you have received this letter, you are already on the mailing list and will receive the drafts of the non-rule policy document and notification of publication.

### 1998 Toxic Release Inventory Reporting

Another area affected by the change in emission estimation techniques is emission reporting. While state emission reporting requirements will be addressed in the non-rule policy document, and ultimately, a state rule, sources are still required to comply with Toxic Release Inventory (TRI) reporting requirements. 1998 TRI Reports are due by July 1, 1999. The TRI regulations require use of the best available data to calculate emissions for the Form R reports. Because the old AP-42 emission factors have been removed for layup processes, they are no longer considered the best available data. Therefore, you must use either the Composite Fabricators Association emissions factors table or site-specific information to calculate emissions for TRI.

### Fiber Reinforced Plastics Initiative

IDEM's Office of Air Management and Office of Pollution Prevention and Technical Assistance are continuing to work jointly to substantially reduce styrene emissions from the fiber reinforced plastics industry. We will be:

- creating a non-rule policy document to explain how the changes in emission estimation techniques effect permits, reporting requirements, compliance, and enforcement;
- writing a state rule to establish controls of air pollution from new and existing FRP sources;
- working with existing sources to achieve emission reductions through implementation of pollution prevention technologies;
- supporting industry efforts to develop and implement new pollution prevention technologies and emission reduction techniques;
- reviewing developments in emission control technologies;
- providing guidance to accurately calculate emissions;
- ensuring compliance through assistance, inspections, and monitoring,
- successfully sharing information with the industry through workshops, fact sheets, web sites, meetings, and mailings.

This initiative provides a great opportunity for technology-sharing. We look forward to working with your company to provide a cleaner environment.

If you have any questions, please contact Karen Teliha at (317) 233-5555 or (800) 451-6027, press 0, and ask for extension 3-5555.

Sincerely,

Janet McCabe  
Assistant Commissioner  
Office of Air Management

Paula Smith  
Acting Assistant Commissioner  
Office of Pollution Prevention  
And Technical Assistance

Enclosure

